

Exhibit B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 22-cv-22538-ALTMAN/Reid

PIERCE ROBERTSON, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

**AMENDED CLASS ACTION
COMPLAINT**

v.

JURY DEMAND

MARK CUBAN, *et al.*,

Defendants.

/

**DECLARATION OF RACHEL GOLD IN SUPPORT OF
PLAINTIFFS' MOTION TO CERTIFY NATIONWIDE ISSUE CLASS**

I, Rachel Gold, hereby declare as follows:

1. I have personal knowledge of the facts stated herein, and if called upon as a witness, I would and could testify competently to the matters set forth herein.
2. I am a citizen and resident of the State of Florida and am over the age of 18.
3. I purchased from Voyager Digital a Voyager Earn Program Account (an "EPA") after being exposed to some or all of Cuban's misrepresentations and omissions regarding the Deceptive Voyager Platform as detailed in the complaint, and thereafter funded the account with sufficient cryptocurrency assets to meet the minimum thresholds for earning the interest Voyager Digital offered to pay on those holdings. To date, I have not recovered my initial investment.
4. I am knowledgeable about the nature of this case and am ready and able to serve as a class representative in this action. I am seeking to be a class representative on behalf of all others in the United States who purchased a Voyager EPA from Voyager Digital Ltd after being exposed to some or all of Cuban's misrepresentations and omissions regarding the Deceptive Voyager Platform as detailed in the complaint.

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5. I have dedicated a significant amount of time to this matter, including reviewing the complaint and amended complaint before each was filed and authorizing their filings, searching for and producing my documents relevant to this action, providing declarations under penalty of perjury regarding facts pertinent to this case, reviewing filings in this case, and communicating with my counsel regarding case developments. I have kept myself reasonably informed as to the status of the case.

6. I am willing to respond to reasonable discovery requests, to appear for a deposition, and I am willing to make myself available to testify at trial, if necessary.

7. I understand that as a class representative, I will have the duty to represent the interests of all unnamed class members. To my knowledge, I do not have any conflicts of interest with the absent class members or individual interests that could be deemed antagonistic to the interests of the class. I have never sought to be appointed as a class representative on behalf of a class in any other litigation.

8. Through bringing this action, I am seeking not only to secure from Defendants, for myself and all Class Members, the damages to which we may be entitled as a result of Defendants' conduct in promoting the Voyager EPAs and in assisting in and actively participating in Voyager Digital's offer and sale of the EPAs, which are unregistered securities that were offered and sold by the Voyager Entities from the State of New Jersey, but also a declaration from the Court that the EPAs are, in fact, unregistered securities, and recovery of attorney's fees and costs expended in this action.

9. I furthermore request that the Court appoint The Moskowitz Law Firm, PLLC and Boies Schiller Flexner LLP, to serve as Class Counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge and belief.

Executed 11/15/2022.

By: 
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Rachel Gold